

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10194-RCL
)	
ANTHONY BUCCI)	

**Government's Interim Response to Defendant Bucci's Motion to
Substitute Property to Secure Bond**

The United States of America, by and through Assistant United States Attorney John T. McNeil, respectfully submits this interim response to Defendant Bucci's Motion to Substitute Property to Secure Bond (Docket No. 110). The government currently has under review the documents submitted by the defendant to transfer the security for his pre-trial release bond. The government has identified for the defendant those additional documents necessary to ensure that the property which he seeks to substitute has sufficient equity in it, and that it has an otherwise clear title. Since discussions with counsel for the defendant are ongoing, the government respectfully requests until April 15, 2005, to formally respond to his motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

Date: April 4, 2005

By: /s/ John T. McNeil
JOHN T. MCNEIL
Assistant U.S. Attorney